



# System of Records Notices (SORNs)

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# AGENDA

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- ☐ Definitions
- ☐ Responsibilities:
  - Privacy Officers
  - Systems Managers
- ☐ Types of SORNS
- ☐ Guidelines
- ☐ Questions
- ☐ Handouts



# Definitions

- ❑ **PERSONALLY IDENTIFIABLE INFORMATION (PII)**
  - PII refers to information which can be used to distinguish or trace an individual's identity, such as their name, Social Security Number (SSN), biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc.
- ❑ **SYSTEM OF RECORDS:**
  - Record
  - Group of Records
  - Under the control of an Agency
  - Retrieved by name, SSN, or other personal identifier.
- ❑ **SYSTEM OF RECORDS NOTICE (SORN):**
  - Serves to notify the public (i.e. individuals):
    - ❑ Is published in the Federal Register
    - ❑ Authorizes the collection and use of PII



# Responsibilities

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## ☐ **PRIVACY OFFICIALS:**

- Execute the organization's Privacy Program in functional areas and activities under their responsibility.
- Ensure that Privacy Act records collected and maintained within the Component or Agency are properly described in a Privacy Act System of Records Notice (SORN).

## ☐ **Ensure:**

- No undeclared systems of records are being maintained.
- A Privacy Act Statement is provided to individuals when information is collected that will be maintained in a system of records.
- Each SORN within their purview is reviewed biennially and updates as needed.
- Updated or new SORNs are submitted to the Defense Privacy Office.



# Responsibilities(con't)

- ❑ **SYSTEM MANAGERS (in collaboration with Privacy Offices):**
  - Prepare new, amended, or altered Privacy Act system of records notices and submit to Component Privacy Office for review.
- ❑ **Ensure:**
  - Appropriate procedures and safeguards are developed, implemented, and maintained.
  - All personnel with access to each system are aware of their responsibilities for protecting personal information being collected and maintained under the Privacy Act.
  - Coordination with the Privacy Official that each Privacy Act SORN within their purview is reviewed biennially.



# Types of Actions of SORNS

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- ☐ Addition
  - New system of records
- ☐ Alteration
  - Significant changes to an existing system of records
- ☐ Amendment
  - Minor/administrative changes to a system of records
- ☐ Deletion
  - Deletion of a system of records; may be due to system being decommissioned or covered under another notice



# Guidelines

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- ☐ Remember the audience
  - Write in a manner the public understands
- ☐ Correct simple errors
  - Spell check
- ☐ Explain Acronyms
  - Spell out acronyms the first time
  - Cite Legal Authorities
    - ☐ Statutes, DoD Regulations, E.O. 9397 (SSN) as amended



# SORN Categories

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1. System identifier
  2. System name
  3. System location
  4. Categories of individuals covered by the system
  5. Categories of records in the system
  6. Authority for maintenance of the system
  7. Purpose(s)
  8. Routine uses
  9. Storage
  10. Retrievability
  11. Safeguards
  12. Retention and disposal
  13. System manager(s) and address
  14. Notification procedures
  15. Record access procedures
  16. Contesting record procedures
  17. Record source categories
  18. Exemptions claimed for the system
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# Privacy Act System of Records Notice

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## **1. System Identifier: "A0025-55 OAA"**

Already assigned and indicated. If changes are necessary, The Component Privacy Office will assign the notice number. Example: A0025-55 OAA: The first letter "A" indicates "Army", the next number "25-55" represents the publication series number related to the subject matter, and the final letter group "OAA" shows the system manager's command, in this case, Office of the Administrative Assistant.

## **2. System Name:**

If changes are needed please ensure that it identifies the system's general purpose. This field is limited to 55 characters.



# System of Records Notice (con't)

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## System Location:

- ☐ The complete mailing address of each location where the record system is maintained must appear in this caption.
- ☐ Provide the complete mailing address of each location/site maintaining the system of records. Use street address, 2-letter state abbreviations and **9-digit** ZIP Codes.
- ☐ Spell out office names.
- ☐ For geographically or organizationally decentralized system locations, "indicate that the official mailing addresses are published as an appendix to the Component's compilation of system of records notices".
- ☐ Do not use office symbols or Post Office boxes.

*i.e., Office of the Secretary of Defense, Director of Readiness, Programming and Assessment, 4000 Defense Pentagon, Washington, DC 20301-4000.*



# System of Records Notice (con't)

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## **4. Categories of Individuals Covered by the System:**

Identify in clear, non-technical terms, individual's records being maintained.

- living person who is a citizen of the U.S.
- alien lawfully admitted for permanent residence.
- Examples: "Department of Defense civilian employees"; "contractors"; "active duty uniformed services personnel"; "civilian employees from other federal agencies".
- Avoid using broad descriptions like "all DoD personnel" unless that is truly accurate.
- Corporations, partnerships, sole proprietorships, professional groups, businesses, and other commercial entities are not "individuals".



# System of Records Notice (con't)

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## **5. Categories of Records in the System:**

Describe in clear, plain language, all categories of records and items of PII in the system.

- Do not identify source documents that are used to collect data and then destroyed.
- Provide the public as much detailed information about the PII.
- If your system of records notice covers a database, it is a good idea to get a print out of the data elements so that you can see all items of PII and records being maintained.
- Do not use overly broad terms or identify forms unless accompanied by a brief explanation.
- The Privacy Impact Assessment may require an update to include PII reflected in the Systems Notice.



# System of Records Notice (con't)

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## **6. Authority for Maintenance of the System:**

A Federal law or Executive order of the President must authorize the collection and maintenance of a system of records. Cite the specific law or Executive Order that authorizes the maintenance of the system. Whenever possible, cite the specific provisions of the statute or Executive Order. Cite the DoD directive/instruction or Departmental Regulation(s) that authorizes the Privacy Act system of records. This is especially Important when using general statutory grants of authority statute ("internal housekeeping") as the primary authority. Always include titles with the citations.



# System of Records Notice (con't)

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## 7. Purpose(s):

List the specific purposes for establishing and maintaining the system of records by your activity. Explain why you collect this information and how the information is used in the course of DoD business. Also state if the information is used for management purposes.

*For example: The purpose of the system of records is to provide a single central facility within the Department of Defense to assess manpower trends, support personnel and readiness functions, to perform longitudinal statistical analyses, identify current and former DoD civilian and military personnel for purposes of detecting fraud and abuse of pay and benefit programs. Also used as a management tool for statistical analysis, tracking, reporting, evaluating program effectiveness and conducting research.*



# System of Records Notice (con't)

## **8. Routine Use(s):**

Routine uses shall be written as follows: "To the user and what they do with the information (purpose/objective)."

List all non-DoD agencies and entities including private sector entities that will routinely provide access to the data or be given the data upon request. List the specific activity or element within the agency/entity to which the Record may be disclosed. For example: "To the Veterans Administration" or "To State and local health agencies". For each routine user identified, include a Statement as to the purpose or purposes for which the record is to be released to that activity. Do not use general statements, such as "To other federal agencies as required" or "To any other appropriate federal agency".

*For example: To the Department of Veterans Affairs for the purpose of using the information in benefit determinations.*



# System of Records Notice (con't)

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## 9. Storage:

State the medium in which the records are maintained. Example:  
"Maintained  
in paper files and on electronic storage media".

## 10. Retrievability:

State how the agency retrieves the records; for example, by name, by  
Social  
Security Number (SSN), by name and Social Security Number (SSN), or  
by  
Fingerprints. To be subject to the Privacy Act, records within a system of  
records **must be retrieved** by a personal identifier.





# System of Records Notice (con't)

## 11. Safeguards:

Identify the system safeguards; for example, storage in safes, vaults, locked cabinets or rooms, use of guards, visitor controls, personnel screening, computer systems software, and so on. Describe safeguards fully without compromising system security. Describe the facility/building safeguards, then the room, then the computer/file cabinet. Then indicate the personnel getting access to the information.

**Example:** "Records are maintained in a controlled facility. Physical entry is restricted by the use of locks, guards, and is accessible only to authorized personnel. Access to records is limited to person(s) with an official "need-to-know" who are responsible for servicing the record in performance of their official duties. Persons are properly screened and cleared for access. Access to computerized data is role-based and further restricted by passwords, which are changed periodically".



# System of Records Notice (con't)

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## 12. Retention and Disposal:

Use the National Archives and Records Administration (NARA) approved disposition. If records are eventually to be destroyed, state the method of destruction (e.g., shredding, burning, pulping, etc.).

\*If, and only if, your activity has sent for NARA approval of the disposition scheduled, we can use the following until the Agency receives an approved disposition: "Disposition pending (treat records as permanent until the National Archives and Records Administration has approved the retention and disposition schedule."

- <http://www.archives.gov/>



# System of Records Notice (con't)

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## **13. System Manager(s) and Address:**

List the position title and duty address of the system manager. Please do not

Include names or phone numbers.

## **14. Notification Procedures:**

The entry should read as follows "Individuals seeking to determine whether

information about themselves is contained in this system of records should

address written inquiries to... Request should contain individual's..."

List the title and duty address of the official authorized to inform the requester if their records are in the system. Specify the information a requester must submit. Example: full name, military status, SSN, date of birth, or proof of identity, and so on. Specify the information an individual must provide in order for the Component to respond to the request (address, email address, etc.).



# System of Records Notice (con't)

## **15. Records Access Procedures:**

The entry should read as follows "Individuals seeking access to information about themselves contained in this system of records should address written inquiries to... Requests should contain individual's... Explain how individuals may arrange to access their records. Describe how an individual can review the record and/or obtain a copy of it. Provide the title and complete mailing address of the official to whom the request for access must be directed; the information the individual must provide in order for the activity to respond to the request; and a description of any proof of identity required.

## **16. Contesting Records Procedures:**

The standard language to use is "The Army's rules for accessing records, and for contesting contents and appealing initial agency determinations are

contained in Army Regulation 25-71; 32 CFR part 505; or may be obtained from the system manager."



# System of Records Notice (con't)

## **17. Record Source Categories:**

Show categories of individuals or other information sources for the system.  
Describe

where the information maintained in the system is obtained from (source documents

and other agencies). Describe the record sources in general terms.

Example, "From individual, DoD records, law enforcement agencies, etc."

## **18. Exemptions Claimed for the System**

Exemptions: If no exemption has been established for the system indicate "None".

If any exemption rule has been established state under which provision(s) of the

Privacy Act it was established. Also, state that an exemption rule has been promulgated in accordance with the requirements of 5 U.S.C. 553 (B) (1), (2), (3), (c)

and (e). See 5400.11-R, Chapter 5 for detailed exemption information.



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# QUESTIONS?

